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December 15, 2023

By ECF

Hon. Stewart D. Aaron, Magistrate Judge
U.S. District Court, S.D.N.Y.
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1970
New York, NY 10007-1312

Re: *Cheng & Chen v. Zhang Medical P.C. et al.*, Case No. 1:21-cv-06682-JGK-SDA
Joint report on the status of plaintiffs' efforts to lift the bankruptcy stay affecting
defendant Zhang Medical P.C.

Your Honor:

We are counsel of record for the plaintiffs in this case and submit this joint report on the status of plaintiffs' efforts to obtain an order from the U.S. Bankruptcy Court for the Southern District of New York modifying the automatic stay to allow this civil case to proceed against the debtor, Zhang Medical P.C., to the extent of insurance coverage and proceeds. Thank you for extending the deadline for this report while I was hospitalized.

I was instructed to work with the debtor's attorney in filing the plaintiffs' motion for relief from the automatic stay. I have been doing so but the debtor's attorney has been unresponsive, notwithstanding that we have exchanged versions of a stipulation that should be ready to file in support of the plaintiffs' motion. The debtor's attorney has today promised to get the motion to me today or no later than Sunday, and has explained that there is so much legal work for her that an additional firm is being brought in.

Thank you.

Respectfully submitted,

s/ Carolyn Shields

Carolyn Shields
Attorneys for Plaintiffs

cc by email and ECF to:
Mr. Christopher Terzian, Esq.
Attorney for Defendants